

10 DJB/KOH: USAO 2019R00649

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

NJUH VALENTINE FOMBE,
a/k/a "Fnu Njuh Valentine Fombe,"
a/k/a "Unku Valentine,"
a/k/a "Valentine,"
GBENGA OWOLABI,
a/k/a "Blow,"
a/k/a "Skb," and
ZACK ABOLAJI ADEOYE,
a/k/a "Zacophonic,"

Defendants

CRIMINAL NO. PW 19CR452

(Conspiracy to Commit Wire Fraud,
18 U.S.C. § 1349; Conspiracy to
Commit Money Laundering,
18 U.S.C. § 1956(h); Aggravated
Identity Theft, 18 U.S.C. § 1028A;
Aiding and Abetting, 18 U.S.C. § 2;
Forfeiture, 18 U.S.C. §§ 981(a)(1)(C)
and 982(a)(1), 21 U.S.C. § 853,
28 U.S.C. § 2461(c))

INDICTMENT

COUNT ONE

(Conspiracy to Commit Wire Fraud)

The Grand Jury for the District of Maryland charges that:

Introduction

At all times relevant to this Indictment:

1. Defendants NJUH VALENTINE FOMBE, a/k/a "Fnu Njuh Valentine Fombe," a/k/a "Unku Valentine," a/k/a "Valentine" ("FOMBE"), GBENGA OWOLABI, a/k/a "Blow," a/k/a "Skb" ("OWOLABI"), and ZACK ABOLAJI ADEOYE, a/k/a "Zacophonic" ("ADEOYE"), were residents of Maryland.

2. Co-conspirator-1 was a resident of Maryland.

3. Business Email Compromise ("BEC") Schemes were complex schemes in which victims were deceived into sending money via wire transfers or other electronic funds transfers

to bank accounts controlled by the criminal perpetrators. The victims erroneously believed the transfers were being sent to accounts of their legitimate counterparties when, in fact, they were being sent to bank accounts controlled by the criminal perpetrators.

4. Check Schemes were schemes in which checks that were counterfeit or that were fraudulently obtained through unauthorized access to victims' bank accounts were deposited into bank accounts controlled by the criminal perpetrators.

5. WhatsApp was an encrypted Internet-based multimedia messaging service used via a smartphone application that functioned using both cellular and wireless data connections.

The Drop Accounts

6. "Drop Accounts" were bank accounts opened or controlled by **FOMBE, OWOLABI, ADEOYE, Co-conspirator 1**, and their co-conspirators that were used to receive money from victims of BEC Schemes and Check Schemes.

The Identity Theft Victims

7. The Minnesota Identity Theft Victim was a resident of Minnesota whose name, date of birth, and social security number the co-conspirators used to open Drop Accounts.

8. The Deceased Identity Theft Victim was deceased, but the co-conspirators used his name and social security number to open Drop Accounts.

9. Ohio Individual 1 was a resident of Ohio who registered Company 1 in Ohio on or about August 11, 2000 ("Ohio Company 1"). The co-conspirators used the name of Ohio Company 1 to open a Drop Account.

10. Ohio Individual 2 was a resident of Ohio who registered Company 2 in Ohio on or about December 17, 2014 ("Ohio Company 2"). The co-conspirators used the name of Ohio Company 2 to open a Drop Account.

The BEC Scheme Victims

11. The following individuals and businesses were victims of BEC Schemes:

- a. Victim A was a business located in California.
- b. Victim B was a resident of Tennessee.
- c. Victim C was a business located in Michigan.
- d. Victim D was a business located in Hawaii.
- e. Victims E and F were residents of Illinois.
- f. Victim G was a resident of California.

The Check Scheme Victims

12. The following individuals were victims of Check Schemes:

- a. Victims H and I were residents of Florida who held a home equity line of credit ("HELOC") account at Regions Bank.
- b. Victim J and her spouse were residents of Hawaii who held an account at Central Pacific Bank.
- c. Victim K and his spouse were residents of California who held an account at Nationwide Bank.

The Conspiracy

13. From a time unknown to the Grand Jury, but beginning at least in or about September 2016, and continuing until at least in or about August 2018, in the District of Maryland and elsewhere, the defendants,

**NJUH VALENTINE FOMBE,
a/k/a “Fnu Njuh Valentine Fombe,”
a/k/a “Unku Valentine,”
a/k/a “Valentine,”
GBENGA OWOLABI,
a/k/a “Blow,”
a/k/a “Skb,” and
ZACK ABOLAJI ADEOYE,
a/k/a “Zacophonic,”**

did knowingly and willfully conspire with each other, **Co-conspirator 1**, and other persons, known and unknown to the Grand Jury, to commit wire fraud, that is, to devise a scheme and artifice to defraud, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises (“the scheme to defraud”), and for the purpose of executing and attempting to execute the scheme to defraud, to transmit and cause to be transmitted by means of wire communication, in interstate and foreign commerce, any writings, signs, signals, pictures, and sounds, in violation of 18 U.S.C. § 1343.

Manner and Means of the Conspiracy and Scheme to Defraud

It was part of the conspiracy and scheme to defraud that:

14. The co-conspirators gained unauthorized access to email accounts, personal identifying information, and bank accounts associated with individuals and businesses targeted by the co-conspirators (collectively, “the Victims”).

15. The co-conspirators sent false wiring instructions to the Victims' email accounts from spoofed email accounts, and produced and obtained counterfeit and fraudulent checks drawn upon (and purporting to be drawn upon) the Victims' bank accounts.

16. **FOMBE, OWOLABI, ADEOYE, Co-conspirator 1**, and their co-conspirators registered, and caused to be registered, in Maryland and elsewhere, businesses that were fraudulent, fictitious, and shell entities.

17. **FOMBE, OWOLABI, ADEOYE, Co-conspirator 1**, and their co-conspirators opened and managed, and caused to be opened and managed, Drop Accounts held in their own names, in aliases, and in the names of the fraudulent, fictitious, and shell businesses that they had registered, in order to direct into and receive the proceeds of BEC Schemes and Check Schemes.

18. **FOMBE, OWOLABI, ADEOYE, Co-conspirator 1**, and their co-conspirators communicated via WhatsApp and other means of electronic communication to provide to each other information related to the BEC Schemes and Check Schemes, including Drop Account and wire transfer information.

19. The co-conspirators caused the Victims, and the financial institutions at which the Victims held bank accounts, to use the wires to transfer money to Drop Accounts.

Overt Acts

20. In furtherance of the conspiracy, and to effect the objects thereof, **FOMBE, OWOLABI, ADEOYE, Co-conspirator 1**, and others known and unknown to the Grand Jury, committed and caused to be committed the following acts, among others, in the District of Maryland and elsewhere:

Star's Peoples Republik LLC / Victim A

- a. On or about September 27, 2016, **FOMBE** and **Co-conspirator 1** registered and caused to be registered in Washington, D.C., the fraudulent, fictitious, and shell business "Star's Peoples Republik LLC."
- b. On or about June 22, 2017, **Co-conspirator 1** opened in Maryland a SunTrust business checking account ending x6296 in the name of "Star S Peoples Republik LLC; Lindsey Star; Sole Proprietor" (the "Star SunTrust Account").
- c. On or about June 26, 2017, **Co-conspirator 1** sent **FOMBE** a WhatsApp message with the account information for the Star SunTrust Account.
- d. On or about June 27, 2017, **FOMBE** sent **Co-conspirator 1** a WhatsApp message requesting "the last 4 for the ein," and **Co-conspirator 1** responded with the numbers "8123."
- e. On or about July 31, 2017, the Star SunTrust Account received a \$12,569.82 wire from a company in Bangkok intended for a beneficiary other than Star S Peoples Republik LLC.
- f. On or about August 7, 2017, the Star SunTrust Account received a \$250,000 wire from Victim A.
- g. On or about August 7, 2017, **Co-conspirator 1** and **FOMBE** sent each other a series of WhatsApp messages, including the messages set forth in the table below:

Sender	Message
Co-conspirator 1	They don block the account
Co-conspirator 1	I dey phone with them
Co-conspirator 1	I mean close the account
FOMBE	Wow
Co-conspirator 1	Yeah

Sender	Message
Co-conspirator 1	They don put me on hold
Co-conspirator 1	Any how I di still bring those things
Co-conspirator 1	So we don't get to loose out
FOMBE	Cut the call
FOMBE	Enter bank move the balance for the account

Co-conspirator 1 / Victim B

h. On or about May 22, 2017, **Co-conspirator 1** opened in Maryland a SunTrust checking account ending x3437 in the name of **Co-conspirator 1** (the “Co-conspirator 1 SunTrust Account”).

i. On or about November 6, 2017, **OWOLABI** sent **Co-conspirator 1** a WhatsApp message that requested **Co-conspirator 1** to “send me the sunny again pls.” **Co-conspirator 1** responded with the banking information for the Co-conspirator 1 SunTrust Account.

j. On or about November 6, 2017, **OWOLABI** sent **Co-conspirator 1** a WhatsApp message stating, “good news awaits us this week.”

k. On or about November 8, 2017, the Co-conspirator 1 SunTrust Account received a \$50,000 wire from Victim B: The notes on the wire stated that the intended beneficiary was a church and that the wire was for Victim B’s “2018 Capital Pledge.”

l. On or about November 8, 2017, **OWOLABI** sent **Co-conspirator 1** a WhatsApp message containing an image of the transaction number for the \$50,000 wire from Victim B to the Co-conspirator 1 SunTrust Account.

JBS Holding LLC / Victims C and D (BEC), and Victims H and I (Check)

m. On or about November 16, 2017, **Co-conspirator 1** and **FOMBE** sent each other WhatsApp messages, including the WhatsApp messages set forth in the table below:

Sender	Message
Co-conspirator 1	Abeg u get any name is fit use make new PP
FOMBE	I get for buy bitcoin do it
FOMBE	Will take care of that shortly
Co-conspirator 1	Ok Bro cos they deny to open me sunny
Co-conspirator 1	So dude want make me new po
Co-conspirator 1	Pp
FOMBE	K

n. On or about November 29, 2017, **Co-conspirator 1** registered and caused to be registered in Maryland the fraudulent, fictitious, and shell business “JBS Holding LLC” and listed the Minnesota Identity Theft Victim as the company’s authorized person and registered agent.

o. On or about December 6, 2017, **FOMBE** sent **Co-conspirator 1** a WhatsApp message with an Equifax cover sheet reflecting the name of the Minnesota Identity Theft Victim and **Co-conspirator 1** responded, “Yessssss.”

p. On or about December 7, 2017, **Co-conspirator 1** opened a SunTrust business account ending in x4720 in the name “JBS Holding LLC” (the “JBS Holding SunTrust Account”). The Minnesota Identity Theft Victim was the sole signor on the JBS Holding SunTrust Account.

q. On or about December 11, 2017, **Co-conspirator 1** opened a Woodforest Bank business account ending in x1077 in the name “JBS Holding LLC” (the “JBS Holding Woodforest Account”). The Minnesota Identity Theft Victim was the sole signor on the JBS Holding Woodforest Account.

r. On or about December 19, 2017, the JBS Holding Woodforest Account received a \$49,671.90 wire from Victim C.

s. Also on or about December 19, 2017, **OWOLABI** sent **Co-conspirator 1** a WhatsApp message containing an image of an invoice to Victim C totaling \$49,671.90, and a second message containing an image of wiring instructions to Victim C that directed the wire to be sent to the JBS Holding Woodforest Account.

t. On or about December 27, 2017, **Co-conspirator 1** deposited into the JBS Holding Woodforest Account at a Woodforest Bank branch in Maryland a \$145,650.45 check drawn on the HELOC account of Victims H and I.

u. Also on December 27, 2017, **Co-conspirator 1** sent **OWOLABI** a WhatsApp message containing an image of a letter from Woodforest Bank notifying the holder of the JBS holding Woodforest Account of a delay in the availability of account funds.

v. On or about January 2, 2017, **Co-conspirator 1** sent **OWOLABI** a WhatsApp message containing the banking information for the JBS Holding SunTrust Account.

w. On or about February 22, 2018, **OWOLABI** sent **Co-conspirator 1** WhatsApp messages, including the messages set forth in the table below:

Sender	Message
OWOLABI	Morning
OWOLABI	Pending
OWOLABI	JBS

x. Also on or about February 22, 2018, **OWOLABI** sent **Co-conspirator 1** a WhatsApp message containing an image of an invoice for \$86,116.51 with instructions directing the recipient to remit payment to the JBS Holding SunTrust Account.

y. On or about February 22, 2018, the JBS Holding SunTrust Account received an \$86,116.51 ACH payment from Victim D.

z. On or about February 27, 2018, the JBS Holding SunTrust Account received a second ACH payment totaling \$86,462.92 from Victim D.

Ashley Smith / Victim J

aa. On or about July 18, 2017, **OWOLABI** and his co-conspirators opened and caused to be opened in Maryland a Capital One, N.A., bank account ending x3959 in the name “Ashley Smith” (the “Smith Capital One Account”).

bb. On or about January 17, 2018, **OWOLABI** and **Co-conspirator 1** sent each other WhatsApp messages, including the messages set forth in the table below:

Sender	Message
OWOLABI	Mail on Friday
Co-conspirator 1	Ok
OWOLABI	Ashley Smith
Co-conspirator 1	Finally
OWOLABI	It's about to go down
OWOLABI	Lol
Co-conspirator 1	Lol

cc. On or about January 19, 2018, **OWOLABI** sent **Co-conspirator 1** WhatsApp messages, including the messages set forth in the table below:

Sender	Message
OWOLABI	Send me the picture of the cheque as well pls
OWOLABI	Bank name-capital one Bank acc no- [redacted]3959 bank Routing no-[redacted]0090 ACC NAME-ASHLEY SMITH
OWOLABI	Thanks dear

dd. Also on or about January 19, 2018, **Co-conspirator 1** sent **OWOLABI** a WhatsApp message containing the image of a check made payable to Ashley Smith and drawn on a Central Pacific Bank account held in the names of Victim J and her spouse.

ee. Later that same day, **Co-conspirator 1** sent **OWOLABI** a WhatsApp message containing an image of a deposit slip bearing the name of Capital One Bank and reflecting a \$16,549 deposit into an account ending x3959.

Ohio Company 1 / Victim K

ff. On or about January 22, 2018, **ADEOYE** opened or caused to be opened at a store in Lutherville, Maryland, a rental mailbox in the name of Ohio Company 1.

gg. Also on or about January 22, 2018, **ADEOYE** opened or caused to be opened a Bank of America business checking account ending x2771 in the name of Ohio Company 1 (the "Ohio Company 1 Account"). The address reflected on bank statements for the Ohio Company 1 Account was the address of the rental mailbox store in Lutherville, Maryland.

hh. On or about March 28, 2018, **ADEOYE** sent **OWOLABI** a WhatsApp message containing the banking information for the Ohio Company 1 Account.

ii. On or about April 4, 2018, a \$96,000 check drawn on a Nationwide Bank account held in the name of Victim K and his wife was deposited into the Ohio Company 1 Account.

Ohio Company 2 / Victims E and F

jj. On or about January 24, 2018, **ADEOYE** opened and caused to be opened a Bank of America business checking account ending x2166 in the name of Ohio Company 2 (the "Ohio Company 2 Account").

kk. On or about February 1, 2018, **ADEOYE** opened and caused to be opened at a store in Columbia, Maryland, a rental mailbox in the name of Ohio Company 2.

ll. In or about February 2018, the account information for the Ohio Company 2 Account was updated to reflect the address of the rental mailbox store in Columbia, Maryland.

mm. On or about March 23, 2018, the Ohio Company 2 Account received a \$57,000 wire from Victim E.

nn. On or about March 24, 2018, **OWOLABI** sent **ADEOYE** a WhatsApp message stating, “More payments coming.”

oo. Also on or about March 24, 2018, **OWOLABI** sent **ADEOYE** a WhatsApp message with the names of Victims E and F, a husband and wife, and then a message stating, “You know dey sleep.”

pp. On or about March 26, 2018, the Ohio Company 2 Account received a \$50,500 wire from Victim F.

PSP Holdings / Victim G

qq. On or about May 30, 2018, **FOMBE** opened and caused to be opened in Maryland a SunTrust business bank account ending x7269 in the name of PSP Holdings, the sole signatory of which was reported to be the Deceased Identity Theft Victim (the “PSP Holding SunTrust Account”).

rr. On or about July 16, 2018, the PSP Holding SunTrust Account received a \$65,000 wire from Victim G.

18 U.S.C. § 1349

COUNT TWO
(Conspiracy to Commit Money Laundering)

The Grand Jury for the District of Maryland further charges that:

Introduction

1. Paragraphs 1 through 12 and 14 through 20 of Count One are incorporated here.

The Conspiracy

2. From a time unknown to the Grand Jury, but beginning at least in or about May 2017, and continuing until at least in or about August 2018, in the District of Maryland and elsewhere, the defendants,

NJUH VALENTINE FOMBE,
a/k/a “Fnu Njuh Valentine Fombe,”
a/k/a “Unku Valentine,”
a/k/a “Valentine,”
GBENGA OWOLABI,
a/k/a “Blow”
a/k/a “Skb,” and
ZACK ABOLAJI ADEOYE
a/k/a “Zacophonic,”

did knowingly conspire with each other, **Co-conspirator 1**, and others known and unknown to the Grand Jury to conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, which involved the proceeds of a specified unlawful activity—to wit, conspiracy to commit wire fraud, in violation of 18 U.S.C. § 1349—while knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity and:

- a. with the intent to promote the carrying on of specified unlawful activity, in violation of 18 U.S.C. § 1956(a)(1)(A)(i); and

b. knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of said specified unlawful activity, in violation of 18 U.S.C. § 1956(a)(1)(B)(i).

Manner and Means of the Money Laundering Conspiracy

It was part of the conspiracy that:

3. **FOMBE, OWOLABI, ADEOYE, Co-conspirator 1**, and their co-conspirators opened and managed, or caused to be opened and managed, Drop Accounts held in their own names, in aliases, and in the names of the fraudulent, fictitious, and shell businesses that they had registered, in order to direct into and receive the proceeds of BEC Schemes and Check Schemes.

4. It was further part of the conspiracy and scheme to defraud that **FOMBE, OWOLABI, ADEOYE, Co-conspirator 1**, and their co-conspirators disbursed the money received from the Victims into Drop Accounts by using wires to transfer money to other Drop Accounts, by withdrawing sums of money in cash, by obtaining cashier's checks, and by writing checks to other individuals or entities, all to promote wire fraud conspiracy and other criminal conduct, and to hide true ownership and disguise the nature, source, and control of those assets.

Overt Acts

5. In furtherance of the conspiracy, and to effect the objects thereof, **FOMBE, OWOLABI, ADEOYE, Co-conspirator 1**, and others, known and unknown to the Grand Jury, committed and caused to be committed the following acts, among others, in the District of Maryland and elsewhere:

Olu J Mark / Victim B

- a. On or about October 4, 2017, **OWOLABI** opened and caused to be opened a Bank of America account ending x5254 in the name “Olu J Mark” (the “Olu J Mark Account”).
- b. On or about November 9, 2017, **OWOLABI** deposited and caused to be deposited into the Olu J Mark Account a \$20,000 cashier’s check that **Co-conspirator 1** had purchased and caused to be purchased from the proceeds of the BEC Scheme on Victim B then held in the Co-conspirator 1 SunTrust Account.

Marian Nana Peters / Victims E and F

- c. On or about February 23, 2018, **OWOLABI** opened and caused to be opened two SunTrust accounts in the name “Marian Nana Peters,” which ended x2973 and x1264, respectively (“Marian Nana Peters x2973” and “Marian Nana Peters x1264”).
- d. On or about March 26, 2018, **ADEOYE** drafted and caused to be drafted against the proceeds of the BEC Scheme on Victims E and F then held in the Ohio Company 2 Account a \$49,850 check made payable to “Marian Nana Peters.”
- e. Also on or about March 26, 2018, **OWOLABI** deposited and caused to be deposited into Marian Nana Peters x2973 the \$49,850 check drawn on the Ohio Company 2 Account.
- f. On or about March 28, 2018, **OWOLABI** transferred and caused to be transferred \$15,000 from Marian Nana Peters x2973 to Marian Nana Peters x1264.
- g. On or about March 30, 2018, **OWOLABI** withdrew \$500 from Marian Nana Peters x1264.

Haja T. Kebe / Victim G

h. On or about June 13, 2018, **Co-conspirator 1** opened a Wells Fargo checking account ending x5244 in the name “Haja T Kebe” (the “Kebe Wells Fargo Account”).

i. On or about July 17, 2018, **FOMBE** purchased and caused to be purchased from the proceeds of the BEC Scheme on Victim G then held in the PSP Holding SunTrust Account a \$19,500 cashier’s check made payable to “Haja T. Kebe.”

j. Also on or about July 17, 2018, **Co-conspirator 1** deposited and caused to be deposited the check into the Kebe Wells Fargo Account.

18 U.S.C. § 1956(h)

COUNT THREE
(Aggravated Identity Theft)

The Grand Jury for the District of Maryland further charges that:

Introduction

1. Paragraphs 1 through 12 and 14 through 20 of Count One are incorporated here.

The Charge

2. From at least in or about November 2017, and continuing to at least in or about February 2018, in the District of Maryland and elsewhere, the defendant,

**NJUH VALENTINE FOMBE,
a/k/a “Fnu Njuh Valentine Fombe,”
a/k/a “Unku Valentine,”
a/k/a/ “Valentine,”**

during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c)—that is, conspiracy to commit wire fraud, in violation of 18 U.S.C. § 1349, as charged in Count One and incorporated here—knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person, that is, the Minnesota Identity Theft Victim’s name, date of birth, and Social Security Number.

18 U.S.C. § 1028A
18 U.S.C. § 2

FORFEITURE ALLEGATION

The Grand Jury for the District of Maryland further finds that:

1. Pursuant to Fed. R. Crim. P. 32.2, notice is hereby given to the defendants that the United States will seek forfeiture as part of any sentence in accordance with 18 U.S.C. §§ 981(a)(1)(C) and 982(a)(1), 21 U.S.C. § 853, and 28 U.S.C. § 2461(c), in the event of the defendants' convictions on Counts One and Two of this Indictment.

Wire Fraud Forfeiture

2. Upon conviction of the offense set forth in Count One of this Indictment, the defendants,

**NJUH VALENTINE FOMBE,
a/k/a "Fnu Njuh Valentine Fombe,"
a/k/a "Unku Valentine,"
a/k/a "Valentine,"
GBENGA OWOLABI,
a/k/a "Blow,"
a/k/a "Skb," and
ZACK ABOLAJI ADEOYE,
a/k/a "Zacophonic,"**

shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to such violation.

Money Laundering Forfeiture

3. Upon conviction of the offense set forth in Count Two of this Indictment, the defendants,

**NJUH VALENTINE FOMBE,
a/k/a “Fnu Njuh Valentine Fombe,”
a/k/a “Unku Valentine,”
a/k/a “Valentine,”
GBENGA OWOLABI,
a/k/a “Blow,”
a/k/a “Skb,” and
ZACK ABOLAJI ADEOYE,
a/k/a “Zacophonic,”**

shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(1), any property, real and personal, involved in such offense, and any property traceable to such property.

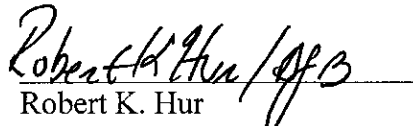
Substitute Assets

4. If, as a result of any act or omission of the defendant, any such property subject to forfeiture:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c), to seek forfeiture of any other property of said defendants up to the value of the forfeitable property.

18 U.S.C. § 981(a)(1)(C)
18 U.S.C. § 982(a)(1)
21 U.S.C. § 853
28 U.S.C. § 2461(c)


Robert K. Hur
United States Attorney

A TRUE BILL:

SIGNATURE REDACTED
Foreperson

Date: 9/23/19